

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

CHARLES RICE KENDALL and
ANN P. HOCHBERG, as Trustees
for The Thomas E. Proctor Heirs Trust,

Plaintiffs,

v.

ALTA MARCELLUS DEVELOPMENT,
LLC, ARD OPERATING, LLC,
INTERNATIONAL DEVELOPMENT
CORPORATION, and SWN
PRODUCTION COMPANY, LLC,

Defendants.

Civil Action No. 1:20-CV-00838-CCC

Electronically Filed

**MOTION TO EXTEND TIME FOR INTERNATIONAL DEVELOPMENT
CORPORATION TO RESPOND TO COMPLAINT**

AND NOW comes Defendant International Development Corporation, by and through its counsel, Robert J. Burnett, Esquire, Brendan A. O'Donnell, Esquire and Houston Harbaugh, P.C. and submits the within Motion to Extend Time for International Development Corporation to Respond to Complaint, stating as follows:

1. This action was commenced on May 22, 2020 via the filing of a Complaint. [ECF Doc. 1].
2. On that same date, a Summons was issued. [ECF Doc. 2].
3. On June 5, 2020, International Development Corporation received the Summons and Complaint.

4. Per the Summons, International Development Corporation's response to the Complaint is due Friday, June 26, 2020.

5. Fed.R.Civ.P. 6(b)(1)(a) permits the Court to enlarge a response time for good cause, "with or without motion or notice if the court acts, or if a request is made, before the original time or its extension expires."

6. Here, the time for International Development Corporation to respond to the Complaint has not expired.

7. The Complaint is lengthy, totaling 184 paragraphs over 6 Counts, with multiple subsets of different types of properties involved and arguments related thereto.

8. International Development Corporation hereby moves for an extension of time to respond to the Complaint, to Tuesday, June 30, 2020, to allow it additional time to examine the claims presented and prepare a response.

9. Counsel for International Development Corporation has conferred with counsel for the Plaintiffs regarding this Motion and the Plaintiffs have no objection to the relief sought herein.

WHEREFORE, Defendant International Development Corporation respectfully requests that this Honorable Court grant the within Motion and set June 30, 2020 as the date by which International Development Corporation's responsive to the Complaint is due.

Respectfully Submitted,

HOUSTON HARBAUGH, P.C.

Dated: June 18, 2020

/s/ Robert J. Burnett

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CERTIFICATE OF SERVICE

I hereby certify that, on June 18, 2020, a true and correct copy of the foregoing Motion for International Development Corporation to Extend Time to Respond to Complaint was filed via the Electronic Case Filing (ECF) System which will forward notification of said filing to all counsel of record:

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